

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

LOWTECH STUDIOS, LLC,)	CASE NO.: 1:23-cv-1437-DAE
)	
Plaintiff,)	
)	
v.)	
)	
KOOAPPS LLC, JONATHAN CHANG, and)	
CHUN-KAI WANG,)	
)	
Defendants.)	
)	
)	
KOOAPPS INC.,)	
)	
Counterclaim-Plaintiff,)	
)	
v.)	
)	
LOWTECH STUDIOS, LLC and)	
STEVEN HOWSE,)	
)	
Counterclaim-Defendants.)	
)	
)	

**LOWTECH STUDIOS, LLC'S AND STEVEN HOWSE'S
ANSWER TO DEFENDANT'S AMENDED COUNTERCLAIMS**

PRELIMINARY STATEMENT

Lowtech Studios, LLC (“Lowtech”) and Steven Howse (“Howse”) (collectively “Counterclaim-Defendants”) hereby answer Counterclaim-Plaintiff Kooapps Inc., f/k/a Kooapps LLC’s, (“Kooapps”) Amended Counterclaims (“Amended Counterclaims”), Dkt No. 93, filed on April 9, 2025.

1. Counterclaim-Defendants admit that Kooapps filed the Amended Counterclaims. Counterclaim-Defendants deny the remaining allegations in Paragraph 1 of the Amended Counterclaims.

PARTIES

2. Counterclaim-Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 2 of the Amended Counterclaims and on that basis deny them.

3. Counterclaim-Defendants admit that Lowtech is a limited liability company organized under the laws of the State of Michigan, with its principal place of business in Austin, Texas.

4. Counterclaim-Defendants admit the allegations contained in this paragraph.

JURISDICTION AND VENUE

5. Paragraph 5 contains legal conclusions to which no response is required. To the extent any of the allegations in Paragraph 5 are deemed factual in nature, Counterclaim-Defendants admit that Kooapps has made the allegations stated in Paragraph 5 but otherwise deny those allegations.

6. Paragraph 6 contains legal conclusions regarding subject matter jurisdiction, diversity jurisdiction, and supplemental jurisdiction to which no response is required. Counterclaim-Defendants deny the remaining allegations in this paragraph.

7. Counterclaim-Defendants admit that this Court has personal jurisdiction over Lowtech. Counterclaim-Defendants deny the remaining allegations in this paragraph.

8. Paragraph 8 contains legal conclusions regarding personal jurisdiction to which no response is required. Counterclaim-Defendants admit that Howse is a resident of this Judicial District and the State of Texas. Counterclaim-Defendants deny the remaining allegations in this paragraph.

9. Counterclaim-Defendants admit that venue is proper in this Judicial District. Counterclaim-Defendants deny the remaining allegations in this paragraph.

FACTUAL BACKGROUND

10. Counterclaim-Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 10 of the Amended Counterclaims and on that basis deny them.

11. Counterclaim-Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 11 of the Amended Counterclaims and on that basis deny them.

12. Counterclaim-Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 12 of the Amended Counterclaims and on that basis deny them.

13. Counterclaim-Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 13 of the Amended Counterclaims and on that basis deny them.

14. Counterclaim-Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 14 of the Amended Counterclaims and on that basis deny them.

15. Counterclaim-Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 15 of the Amended Counterclaims and on that basis deny them.

16. Counterclaim-Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 16 of the Amended Counterclaims and on that basis deny them.

17. Counterclaim-Defendants admit that Kooapps has publicly announced partnerships with Apple Arcade, Netflix, and Nintendo. Counterclaim-Defendants lack sufficient knowledge to admit or deny the remaining allegations in this paragraph and on that basis deny them.

18. Counterclaim-Defendants admit Lowtech was founded by Howse in 2016. Counterclaim-Defendants admit that Howse created and developed the Slither.io icon and word mark. Counterclaim-Defendants deny the remaining allegations in this paragraph.

19. Counterclaim-Defendants admit that Lowtech is the developer of Slither.io. Counterclaim-Defendants deny the remaining allegations in this paragraph.

20. Counterclaim-Defendants admit that Slither.io was launched in early 2016 on web and mobile. Counterclaim-Defendants deny the remaining allegations in this paragraph.

21. Counterclaim-Defendants lack sufficient knowledge to admit or deny Kooapps' characterization of "in-app live events" and on that basis deny the allegations relating to in-app live events. Counterclaim-Defendants deny the remaining allegations in this paragraph.

22. Counterclaim-Defendants deny the allegations in Paragraph 22 of the Amended Counterclaims.

23. Counterclaim-Defendants deny the allegations in Paragraph 23 of the Amended Counterclaims.

24. Counterclaim-Defendants admit that by 2024, Lowtech had removed in-game advertisements and in-game purchases from the iOS version of Slither.io and deprioritized ads on the Google Play version of Slither.io. Counterclaim-Defendants deny the remaining allegations in this paragraph.

25. Counterclaim-Defendants deny the allegations in Paragraph 25 of the Amended Counterclaims.

26. Counterclaim-Defendants admit that Kooapps reached out to Lowtech multiple times between 2019 and 2023 inquiring about buying Slither.io and that Lowtech did not send a response to Kooapps' inquiries. Counterclaim-Defendants deny the remaining allegations in this paragraph.

27. Counterclaim-Defendants admit that Lowtech filed its Original Complaint (Dkt. 1) against Kooapps and on November 22, 2023. Counterclaim-Defendants lack sufficient knowledge to admit or deny when Kooapps was first made aware of this lawsuit and on that basis deny the remaining allegations in this paragraph.

28. Counterclaim-Defendants admit that updates were made to Slither.io in 2024. Counterclaim-Defendants deny the remaining allegations in this paragraph.

29. Counterclaim-Defendants admit the allegations contained in this paragraph.

30. Counterclaim-Defendants admit Howse has authored posts using the "Hypah" and "Hypah2" account names. Counterclaim-Defendants deny the remaining allegations in this paragraph.

31. Counterclaim-Defendants admit that Discord is a social media platform. Counterclaim-Defendants deny Howse engaged in defamation. Counterclaim-Defendants lack sufficient knowledge to admit or deny the remaining allegations in this paragraph and on that basis deny them.

32. Counterclaim-Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 32 and on that basis deny them.

33. Paragraph 33 Counterclaim-Defendants admits that Howse has made posts on the Discord chat server dedicated to discussions about Slither.io. Counterclaim-Defendants admit that the Slither.io Discord chat server has over 4,800 members. Counterclaim-Defendants deny the remaining allegations in this paragraph.

34. Counterclaim-Defendants lack sufficient knowledge to admit or deny the allegations of Paragraph 34 and on that basis deny them.

35. Counterclaim-Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 35 of the Amended Counterclaims and on that basis deny them.

36. Counterclaim-Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 36 of the Amended Counterclaims and on that basis deny them.

37. Counterclaim-Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 37 of the Amended Counterclaims and on that basis deny them.

38. Counterclaim-Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 38 of the Amended Counterclaims and on that basis deny them.

39. Counterclaim-Defendants admit that when a user “rolls over” the username “Hypah” in the Slither.io Discord chat server, a “Developer” tag appears. Counterclaim-Defendants admit that Howse posted the text content of the message under the display name “Hypah” that is included as a screenshot in Paragraph 39. Counterclaim-Defendants deny the remaining allegations in this paragraph.

40. Counterclaim-Defendants admit that the username “Hypah” posted messages regarding Slither.io in the Slither.io Discord chat server. Counterclaim-Defendants admit that Howse posted the text content of the messages under the display name “Hypah” that are in the included screenshot in Paragraph 40. Counterclaim-Defendants deny the remaining allegations in this paragraph.

41. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 41. Counterclaim-Defendants deny the remaining allegations in this paragraph.

42. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 42. Counterclaim-Defendants deny the remaining allegations in this paragraph.

43. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 43. Counterclaim-Defendants deny the remaining allegations in this paragraph.

44. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 44. Counterclaim-Defendants deny the remaining allegations in this paragraph.

45. Counterclaim-Defendants deny the allegations in Paragraph 45 of the Amended Counterclaims.

46. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 46. Counterclaim-Defendants deny the remaining allegations in this paragraph.

47. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 47. Counterclaim-Defendants deny the remaining allegations in this paragraph.

48. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 48. Counterclaim-Defendants deny the remaining allegations in this paragraph.

49. Counterclaim-Defendants deny the allegations in Paragraph 49 of the Amended Counterclaims.

50. Paragraph 50 fails to identify the “relevant statements” that Kooapps alleges are “false and inflammatory,” therefore Counterclaim-Defendants lack sufficient knowledge to admit or deny those allegations, and on that basis, deny them. Counterclaim-Defendants deny the remaining allegations in this paragraph.

51. Counterclaim-Defendants deny the allegations in Paragraph 51 of the Amended Counterclaims.

52. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 52. Counterclaim-Defendants deny the remaining allegations in this paragraph.

53. Counterclaim-Defendants deny the allegations in Paragraph 53 of the Amended Counterclaims.

54. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 54. Counterclaim-Defendants deny the remaining allegations in this paragraph.

55. Counterclaim-Defendants deny the allegations in Paragraph 55 of the Amended Counterclaims.

56. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 56. Counterclaim-Defendants deny the remaining allegations in this paragraph.

57. Counterclaim-Defendants deny the allegations in Paragraph 57 of the Amended Counterclaims.

58. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 58. Counterclaim-Defendants deny the remaining allegations in this paragraph.

59. Counterclaim-Defendants deny the allegations in Paragraph 59 of the Amended Counterclaims.

60. Counterclaim-Defendants deny the allegations in Paragraph 60 of the Amended Counterclaims.

61. Paragraph 61 fails to identify the “several statements” that Kooapps alleges are “the ‘Smear Campaign Statements’”; therefore, Counterclaim-Defendants lack sufficient knowledge to admit or deny those allegations, and on that basis, deny them. Counterclaim-Defendants deny the remaining allegations in this paragraph.

62. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 62. Counterclaim-Defendants deny the remaining allegations in this paragraph.

63. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 63. Counterclaim-Defendants deny the remaining allegations in this paragraph.

64. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 64. Counterclaim-Defendants deny the remaining allegations in this paragraph.

65. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 65. Counterclaim-Defendants deny the remaining allegations in this paragraph.

66. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 66. Counterclaim-Defendants deny the remaining allegations in this paragraph.

67. Counterclaim-Defendants admit that YouTube is a social media platform. Counterclaim-Defendants lack sufficient knowledge to admit or deny Kooapps’ characterization of YouTube and the unspecified Netflix trailer, and on that basis deny those characterizations. Counterclaim-Defendants deny the remaining allegations in this paragraph.

68. Counterclaim-Defendants deny the allegations in Paragraph 68 of the Amended Counterclaims.

69. Counterclaim-Defendants lack sufficient knowledge to admit or deny the allegations relating to the “popular comment on YouTube,” and on that basis deny those allegations. Counterclaim-Defendants deny the remaining allegations in this paragraph.

70. Counterclaim-Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 70 of the Amended Counterclaims and on that basis deny them.

71. Counterclaim-Defendants deny the allegations in Paragraph 71 of the Amended Counterclaims.

72. Counterclaim-Defendants deny the allegations in Paragraph 72 of the Amended Counterclaims.

73. Counterclaim-Defendants deny the allegations in Paragraph 73 of the Amended Counterclaims.

74. Counterclaim-Defendants deny the allegations in Paragraph 74 of the Amended Counterclaims.

75. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 75. Counterclaim-Defendants deny the remaining allegations in this paragraph.

76. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 76. Counterclaim-Defendants deny the remaining allegations in this paragraph.

77. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 77. Counterclaim-Defendants deny the remaining allegations in this paragraph.

78. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 78. Counterclaim-Defendants deny the remaining allegations in this paragraph.

79. Counterclaim-Defendants deny the allegations in Paragraph 79 of the Amended Counterclaims.

80. Counterclaim-Defendants deny the allegations in Paragraph 80 of the Amended Counterclaims.

81. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 81. Counterclaim-Defendants deny the remaining allegations in this paragraph.

82. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 82. Counterclaim-Defendants deny the remaining allegations in this paragraph.

83. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 83. Counterclaim-Defendants deny the remaining allegations in this paragraph.

84. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 84. Counterclaim-Defendants deny the remaining allegations in this paragraph.

85. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 85. Counterclaim-Defendants deny the remaining allegations in this paragraph.

86. Counterclaim-Defendants deny the allegations in Paragraph 86 of the Amended Counterclaims.

87. Counterclaim-Defendants admit that Steven Howse has occasionally referenced Kooapps games using the display name ‘Hypah’ on the Discord platform. Counterclaim-Defendants deny the remaining allegations in this paragraph.

88. Counterclaim-Defendants deny the allegations in Paragraph 88 of the Amended Counterclaims.

89. Counterclaim-Defendants deny the allegations in Paragraph 89 of the Amended Counterclaims.

90. Counterclaim-Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 90 of the Amended Counterclaims and on that basis deny them.

91. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 91. Counterclaim-Defendants deny the remaining allegations in this paragraph.

92. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 92. Counterclaim-Defendants deny the remaining allegations in this paragraph.

93. Counterclaim-Defendants admit that Howse posted the text content of the message(s) under the display name “Hypah” that is/are included as a screenshot in Paragraph 93. Counterclaim-Defendants deny the remaining allegations in this paragraph.

94. Counterclaim-Defendants deny the allegations in Paragraph 94 of the Amended Counterclaims.

95. Counterclaim-Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 95 of the Amended Counterclaims and on that basis deny them.

96. Counterclaim-Defendants deny the allegations in Paragraph 96 of the Amended Counterclaims.

CAUSES OF ACTION

Counterclaim I – False Advertising in Violation of 15 U.S.C. § 1125(a)(1)(B) (Against All Counterclaim-Defendants)

97. Counterclaim-Defendants incorporate by reference their responses to Paragraphs 1 through 96 as though fully set forth herein.

98. Counterclaim-Defendants deny the allegations in Paragraph 98 of the Amended Counterclaims.

99. Counterclaim-Defendants deny the allegations in Paragraph 99 of the Amended Counterclaims.

100. Counterclaim-Defendants deny the allegations in Paragraph 100 of the Amended Counterclaims.

101. Counterclaim-Defendants deny the allegations in Paragraph 101 of the Amended Counterclaims.

Counterclaim II – Defamation (Against All Counterclaim-Defendants)

102. Counterclaim-Defendants incorporate by reference their responses to Paragraphs 1 through 101 as though fully set forth herein.

103. Counterclaim-Defendants deny the allegations in Paragraph 103 of the Amended Counterclaims.

104. Counterclaim-Defendants deny the allegations in Paragraph 104 of the Amended Counterclaims.

105. Counterclaim-Defendants deny the allegations in Paragraph 105 of the Amended Counterclaims.

106. Counterclaim-Defendants deny the allegations in Paragraph 106 of the Amended Counterclaims.

107. Counterclaim-Defendants deny the allegations in Paragraph 107 of the Amended Counterclaims.

Counterclaim III – Business Disparagement (Against All Counterclaim-Defendants)

108. Counterclaim-Defendants incorporate by reference their responses to Paragraphs 1 through 107 as though fully set forth herein.

109. Counterclaim-Defendants deny the allegations in Paragraph 109 of the Amended Counterclaims.

110. Counterclaim-Defendants deny the allegations in Paragraph 110 of the Amended Counterclaims.

111. Counterclaim-Defendants deny the allegations in Paragraph 111 of the Amended Counterclaims.

**Counterclaim IV – Tortious Interference with Prospective Business Relations
(Against All Counterclaim-Defendants)**

112. Counterclaim-Defendants incorporate by reference their responses to Paragraphs 1 through 111 as though fully set forth herein.

113. Counterclaim-Defendants deny the allegations in Paragraph 113 of the Amended Counterclaims.

114. Counterclaim-Defendants deny the allegations in Paragraph 114 of the Amended Counterclaims.

115. Counterclaim-Defendants deny the allegations in Paragraph 115 of the Amended Counterclaims.

Counterclaim V – Statutory Unfair Competition in Violation of Wash. Rev. Code Ann. § 19.86.020 (Against All Counterclaim-Defendants)

116. Counterclaim-Defendants incorporate by reference their responses to Paragraphs 1 through 115 as though fully set forth herein.

117. Counterclaim-Defendants deny the allegations in Paragraph 117 of the Amended Counterclaims.

118. Counterclaim-Defendants deny the allegations in Paragraph 118 of the Amended Counterclaims.

119. Counterclaim-Defendants deny the allegations in Paragraph 119 of the Amended Counterclaims.

DEMAND FOR A JURY TRIAL

Counterclaim-Defendants request a jury trial on all matter so triable.

PRAYER FOR RELIEF

Counterclaim-Defendants deny Kooapps is entitled to any of the relief it has requested in the Amended Counterclaims. Counterclaim-Defendants request that the Court enter judgment that:

- a. Kooapps take nothing by way of its Amended Counterclaims;
- b. The Court declare this case exceptional and award Counterclaim-Defendants their fees;
- c. Counterclaim-Defendants shall recover the costs of suit; and
- d. All other relief the Court deems appropriate.

AFFIRMATIVE DEFENSES

Counterclaim-Defendants incorporate by reference the foregoing paragraphs in their entirety and assert the following Affirmative Defenses to the claims set forth in the Amended Counterclaims without assuming the burden of proving any fact, issue, or element of a cause of action where such burden properly belongs to Kooapps. Nothing stated herein is intended or shall be construed as an admission that any particular issue or subject matter is relevant to the allegations in the Amended Counterclaims. Counterclaim-Defendants reserve the right to amend or supplement their affirmative defenses as additional facts concerning defenses become known.

FIRST DEFENSE (Failure to State a Claim)

Kooapps' Amended Counterclaims, and each cause of action alleged therein, fails to state facts sufficient to constitute a cause of action against Counterclaim-Defendants and fails to state a claim upon which relief can be granted.

SECOND DEFENSE (Unclean Hands)

Kooapps' claims are barred, in whole or in part, by the equitable doctrine of unclean hands.

THIRD DEFENSE (Fair Use)

Kooapps' claims are barred, in whole or in part, as the acts of Counterclaim-Defendants alleged therein constitute fair use, nominative fair use, and/or descriptive use.

FOURTH DEFENSE (Materiality)

Kooapps' claims are barred because even if Kooapps could show any representation was false, it cannot show the representation was material to consumers or affected consumers' purchasing decisions.

**FIFTH DEFENSE
(Puffery)**

Kooapps' claims are barred because even if Kooapps could show any representations were false, these representations constitute non-actionable puffery.

**SIXTH DEFENSE
(Opinion)**

Kooapps' claims are barred because even if Kooapps could show any representations were false, these representations constitute non-actionable statements of opinion.

**SEVENTH DEFENSE
(No Causation)**

Kooapps' claims are barred, in whole or in part, because Kooapps' damages, if any, were not caused by Counterclaim-Defendants.

**EIGHTH DEFENSE
(No Damages)**

Without admitting that Kooapps states a claim, there has been no damage in any amount, manner, or at all by reason of any act alleged against Kooapps in the Amended Counterclaims, and therefore the relief prayed for in the Amended Counterclaims cannot be granted.

**NINTH DEFENSE
(No Lanham Act Standing)**

Kooapps' claims are barred, in whole or in part, because even if Kooapps could show any representation was false, Kooapps has not suffered an injury to a commercial interest in reputation or sales that was caused by Counterclaim-Defendants' alleged advertising.

**TENTH DEFENSE
(Estoppel)**

Kooapps' claims are barred in whole or in part by the doctrine of acquiescence, estoppel, waiver, or laches.

ELEVENTH DEFENSE
(Truth)

Kooapps' claims are barred in whole or in part because the alleged statements or representations were substantially true at the time they were made.

TWELFTH DEFENSE
(Failure to Mitigate Damages)

Kooapps' claims are barred in whole or in part because of Kooapps' failure to take reasonable efforts to mitigate any alleged damages.

Date: April 23, 2025

Respectfully submitted,

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DEFENDANTS**
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STEVEN HOWSE

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing document was served on the attorneys of record by delivering a true and correct copy on April 23, 2025, as follows:

Via the Court's E-filing Service to:

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